IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

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| . C.A. No. 06-189-SLR |
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MOTION AND ORDER FOR ADMISSION PRO HAC VICE

Pursuant to Local Rule 83.5 and the attached certifications, counsel moves the admission pro hac vice of Elizabeth T. Timkovich of Axinn, Veltrop & Harkrider LLP, 90 State House Square, Hartford, CT 06103-3702, (860) 275-8100, (860) 275-8101 (fax), to represent plaintiff INEOS Fluor Americas LLC in this matter. Pursuant to Standing Order for District Court Fund, the annual fee of \$25.00 per attorney is enclosed with this motion.

YOUNG/CONAWAY STARGATT & TAYLOR LLP

C. Barr Flinn (No. 4092) [bflinn@ycst.com] Karen L. Pascale (No. 2903) [kpascale@ycst.com] Chad S. C. Stover (No. 4919) [cstover@ycst.com] The Brandywine Building 1000 West Street, 17th Floor P.O. Box 391

Wilmington, Delaware 19899-0391

Tel.: 302-571-6600

Attorneys for Plaintiff INEOS Fluor Americas LLC

ORDER GRANTING MOTION

| | IT IS HEREBY | ORDERED | that | counsel's | motion | for | the | admission | pro | hac | vice | of |
|--------|------------------|-------------|------|-----------|--------|------|------|---------------|------|-----|------|----|
| Elizab | eth T. Timkovich | is granted. | | | | | | | | | | |
| Date: | | _, 2007 | | | | | | | | | | |
| | | | | | Unit | ed S | tate | s District Ju | ıdge | | | |

Dated: March 29, 2007

CERTIFICATE OF SERVICE

I, Chad S. C. Stover, Esquire, hereby certify that on March 29, 2007, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

Martin P. Tully [mtully@nmat.com]
Jason A. Cincilla [jcincilla@mnat.com]
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I further certify that on March 29, 2007, I caused a copy of the foregoing document to be served by hand delivery and e-mail on the above-listed counsel of record and on the following non-registered participants in the manner indicated:

By E-Mail

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Attorneys for Plaintiff, INEOS Fluor Americas LLC

DB02:5473355.1 065061.1001

CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court and am admitted, practicing and in good standing as a member of the Bar of the State of Connecticut, and, pursuant to Local Rule 83.6, submit to the disciplinary jurisdiction of this Court for any misconduct which occurs in the preparation or course of this action. I also certify I am generally familiar with this Court's Local Rules.

Elizabeth T. Timkovich

AXINN, VELTROP & HARKRIDER LLP

Simborich

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DATED: March 28, 2007